

Appln No. 09/807,070

Amdt date April 25, 2005

Reply to Office action of February 23, 2005

**REMARKS/ARGUMENTS**

Claims 1-23 remain in the present application, of which claims 1 and 21 are independent. None of the claims has been amended herein. Applicants respectfully request reconsideration and allowance of claims 21-23.

**I. Rejection of claims 1, 3, 5, 7, 9, 11, 13, 15, 17 and 19 under 35 U.S.C. §103(a)**

Claims 1, 3, 5, 7, 9, 11, 13, 15, 17 and 19 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,926,796 ("Walker et al.") in view of U.S. Patent No. 5,869,826 ("Eleftheriou") and further in view of U.S. Patent No. 6,067,530 ("Brooks Jr. et al.").

In rejecting these claims, the Examiner admits that "[n]either Walker nor Eleftheriou teaches cash management system as claimed." However, the Examiner contends that "Brooks teaches a cash management system having cash depositing and cash dispensing function," and cites FIG. 2A. Applicants disagree and respectfully traverse because FIG. 2A of Brooks Jr. et al. illustrates, among other items, an electronic drop safe 24, which of course has a "cash depositing" function, but lacking any "cash dispensing" function. Since FIG. 2A of Brooks et al. does not show "a cash management system having cash depositing and cash dispensing function," applicants submit that the Examiner failed to show a *prima facie* case of obviousness over Walker et al. in view of Eleftheriou and further in view of Brooks et al.

**Appln No. 09/807,070**

**Amdt date April 25, 2005**

**Reply to Office action of February 23, 2005**

Further, the Examiner continues to maintain that "Walker et al teach a method of providing a communication interface (col. 7, lines 18-23) for coupling a point-of-sale (P.O.S.) system to a cash management system (col. 6, lines 46-48) for providing communication between the P.O.S. system and the cash management system (col. 7, lines 30-40)."

Applicants, however, cannot find any reference to a cash management system similar to that of the present invention in the cited sections of Walker et al., nor in any other portion of Walker et al. By way of example, while the cash management system of the present invention includes "a cash management system having cash depositing and cash dispensing functions," Walker et al. is directed to a method and apparatus for selling subscriptions to periodicals in a retail environment. As such, it can be seen in the sections of Walker et al. cited by the Examiner, namely, Col. 7, lines 18-40, that the POS terminal 120 in Walker et al. is connected to a retail [periodicals] subscription system 130, which the Examiner appears to equate with the cash management system of the present invention. Applicants respectfully disagree.

A detailed view of the retail subscription system 130 is illustrated in FIG. 4. It can be seen in FIG. 4 and the corresponding description on Col. 7, line 57 to Col. 8, line 23, that the retail subscription system 130 includes CPU 410, RAM 420, ROM 430, data storage device 440, clock 450, authentication code generator 460, communication port 470, data network interface 480, and customer assistance service interface 490.

**Appln No. 09/807,070**

**Amdt date April 25, 2005**

**Reply to Office action of February 23, 2005**

In fact, Walker et al. describes the functions of the retail subscription system as follows:

"Data storage device 440 maintains retail subscription system (RSS) subscriber database 442 and retail subscription system authentication code (RSSAC) database 444. RSS subscriber database 442 stores subscription information transmitted from the retailer. RSSAC database 444 contains a list of authentication codes used to validate subscription sales." (Col. 8, lines 8-14)

As such, there is no teaching or suggestion that the retail subscription system 130 is anything but a system for enabling subscription at a retail site, nor is there any indication that the retail subscription system 130 is used in any manner even remotely similar to the cash management system of the present invention.

As can be seen in FIG. 1 of Walker et al., the POS terminal 120 is also connected to the POS controller 122, however, the POS controller 122 appears to make up a POS system rather than being a separate cash management system. Further, "POS controller 122 preferably comprises a server equipped with conventional hardware, including CPU 310, RAM 320, ROM 330, data storage device 340, clock 350, communications port 360, data network interface 370, and POS network interface 380," and does not have any cash management functions similar to those of the cash management system of the present invention.

The Examiner admits in the Office Action that "Walker et al do not teach providing software on the cash management system to

**Appln No. 09/807,070**

**Amdt date April 25, 2005**

**Reply to Office action of February 23, 2005**

permit operation of the cash management system over a communication link and providing software on the P.O.S. system to permit control of the cash management system over the internet." However, the Examiner continues to maintain that "Eleftheriou teaches a method wherein providing software on the P.O.S. system to permit control of the cash management system over the communication link (modem or wide-area network) and providing software on the P.O.S. system to permit control of the cash management system over the internet," and cites Col. 4, lines 15-26 of Eleftheriou.

However, Col. 4, lines 15-26 of Eleftheriou merely recites:

"The computer system 102 may also include other similar means for allowing computer programs or other instructions to be loaded. Such means can include, for example, a communications interface 118. Communications interface 118 allows software and data to be transferred between computer system 102 and external devices. Examples of communications interface 118 can include a modem, a network interface (such as an Ethernet card), a communications port, etc. Software and data transferred via communications interface 118 are in the form of signals which can be electronic, electromagnetic, optical or other signals capable of being received by communications interface 118."

First of all, the above description from Eleftheriou merely describes some means of loading software or other data, and does not refer to any loading of software related to "providing

**Appln No. 09/807,070**

**Amdt date April 25, 2005**

**Reply to Office action of February 23, 2005**

software on the cash management system to permit operation of the cash management system over a communication link, and providing software on the P.O.S. system to permit control of the cash management system over the communication link."

Therefore, Walker et al., Eleftheriou and Brooks Jr. et al. together do not teach or suggest "providing software on the cash management system to permit operation of the cash management system over a communication link, and providing software on the P.O.S. system to permit control of the cash management system over the communication link."

Further, without any teaching or suggestion to combine the references, applicants do not believe that Eleftheriou should be combined with any other references to reject the claims of the present invention, much less Walker et al. which does not even disclose "a communication interface for coupling a point-of-sale (P.O.S.) system to a cash management system for providing communication between the P.O.S. system and the cash management system."

Claim 1 recites, "[a] method of providing a communication interface for coupling a point-of-sale (P.O.S.) system to a cash management system having cash depositing and cash dispensing functions, the communication interface for providing communication between the P.O.S. system and the cash management system including providing software on the cash management system to permit operation of the cash management system over a communication link, and providing software on the P.O.S. system to permit control of the cash management system over the communication link." (Emphasis Added)

Appln No. 09/807,070

Amdt date April 25, 2005

Reply to Office action of February 23, 2005

Since such a method is not disclosed, either individually or together in combination, by Walker et al., Eleftheriou and Brooks et al., applicants submit that claim 1 is not obvious over Walker et al. in view of Eleftheriou and Brooks et al. Therefore, applicants request that the rejection of claim 1 be withdrawn and that it be allowed.

Since claims 3, 5, 7, 9, 11, 13, 15, 17 and 19 depend, directly or indirectly, from claim 1, they include all the terms and limitations of claim 1 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants request that the rejection of claims 3, 5, 7, 9, 11, 13, 15, 17 and 19 be withdrawn and that they be allowed.

**II. Rejection of Claims 2, 4, 6, 8, 10, 12, 14, 16, 18 and 20-23 under 35 U.S.C. § 103(a)**

Claims 2, 4, 6, 8, 10, 12, 14, 16, 18 and 20-23 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Walker et al. in view of Eleftheriou and further in view of U.S. Patent No. 5,953,709 ("Gilbert et al.") and Brooks, Jr. et al.

In rejecting these claims, the Examiner admits that "[n]either Walker et al nor Eleftheriou teaches providing a graphical user interface on the P.O.S. system to permit control of the cash management system over the communication link." However, the Examiner maintains that "Gilbert et al. teach a cash machine system 28 over a communication link (service

Appln No. 09/807,070

Amdt date April 25, 2005

Reply to Office action of February 23, 2005

terminal 22) including providing a graphical user interface," and cites col. 3, lines 16-22, FIG. 1.

Gilbert et al., however, has a user screen 34 (regardless of whether it constitutes a GUI or not) integrated to the cash machine 28, and not to the service terminal 22 or the processor 24. As such, unlike claim 2 of the present invention which recites, in a relevant portion, "providing a graphical user interface on the P.O.S. system to permit control of the cash management system over the communication link," the user screen 34 on the cash machine 28 in FIG. 1 of Gilbert et al. does not permit control of the cash machine 28 over the communication link because the cash machine 28 is the device on which the user screen is mounted. In addition, the service terminal 22 appears to be used to print vouchers, and not to control the cash machine system 28.

Further, since claims 2, 4, 6, 8, 10, 12, 14, 16, 18, 20 depend, directly or indirectly, from claim 1, they incorporate all the terms and limitations of claim 1 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants request that the rejection of claims 2, 4, 6, 8, 10, 12, 14, 16, 18 and 20 be withdrawn and that they be allowed.

#### **Reasons for rejecting claims 21-23 requested**

As to claims 21-23, the Examiner appears to have rejected them without even giving any reason for the rejection. By way of example, the Examiner does not indicate which portion of which reference shows "providing a user interface software on

Appln No. 09/807,070

Amdt date April 25, 2005

Reply to Office action of February 23, 2005

the P.O.S. system which emulates the user interface of the cash management system" (Emphasis Added) as recited in claim 21. As such, the Examiner fails to show the *prima facie* case of obviousness for claims 21-23. Therefore, applicants request that the rejection of claims 21-23 be withdrawn and that they be allowed.

### **III. "Response to Arguments" in the Office Action**

In the response to applicants' arguments, the Examiner contends that "it has been known in the art that an electronic cash register (hereinafter sometimes referred to as "cash register"), generally called as an ECR (Electronic Cash Register), is an apparatus that is placed in a retail store or the like . . . ." However, according to col. 6, lines 46-48 of Walker et al., "POS terminal 120 basically functions as a conventional digital cash register." As such, it is the POS terminal 120 itself that functions as cash register according to Walker et al., and not any separate cash management system.

Further, the Examiner contends that "Eleftheriou's system can load software or other data so it is well capable in loading the software needed to make the cash management system disclosed by Walker operate as it should." Eleftheriou's system may or may not be able to load any software or other data. Applicants do not understand, however, why this is relevant to the claims of the present application. As discussed above, Eleftheriou does not teach or suggest loading of any software related to "providing software on the cash management system to permit operation of the cash management system over a communication



Appln No. 09/807,070

Amdt date April 25, 2005

Reply to Office action of February 23, 2005

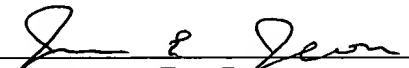
link, and providing software on the P.O.S. system to permit control of the cash management system over the communication link."

**IV. Concluding Remarks**

In view of the foregoing amendments and remarks, applicants respectfully request an early issuance of a patent with claims 1-23. If there are any remaining issues that can be addressed over the telephone, the Examiner is invited to call the applicants' attorney at the number listed below.

Respectfully submitted,

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